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May 26, 2016

Mary D. Nichols
Chair
California Environmental Protection Agency
Air Resources Board
1001 "I" Street
Sacramento, CA

RE: NAFEM Public Comments on the Air Resources Board's Short-Lived
Climate Pollutant Reduction Strategy

Dear Ms. Nichols:

The North American Association of Food Equipment Manufacturers (NAFEM) appreciates the opportunity to submit a response to the Air Resources Board's draft Short-Lived Climate Pollutant (SLCP) Reduction Strategy.

NAFEM represents more than 550 members that manufacture commercial foodservice equipment and supplies for the food away from home market. These member companies make the tools used to prepare, cook, serve and store food safely, including a variety of refrigeration and cooking products.

NAFEM has a long history of supporting the prevention of climate change and the reduction of energy consumption. Working with federal agencies, like the U.S. Environmental Protection Agency (USEPA) and the U.S. Department of Energy (USDOE), our members strive to make products more energy efficient where technologically and economically feasible in the North American market.

To that end, while we support reducing emissions that contribute to the Global Warming Potential (GWP), we believe that any transition to other refrigerants or restrictions to the use of charbroilers could have severe, negative effects on the industry, the consumer, and the environment, if established without consideration of a broad set of factors.

It is important to understand that any transition to alternative refrigeration will take a significant amount of time. Among the many factors to consider are technological and safety implications, the creation of a diverse product line that leads to a lengthy design cycle and the potentially adverse effects some alternative refrigerants can have on energy efficiency and energy consumption. There are also important food safety issues that are essential in

the development of commercial refrigeration products. If not taken seriously, these factors could have many unintended negative consequences, including loss of jobs and innovative products foodservice operators need to serve consumer demands.

We encourage ARB to align with the federal standards. For example, because large commercial systems can't operate with the current charge limits of A3 refrigerants, these systems need, alternatives like the 450 and 513 refrigerants, that are currently allowed under federal EPA regulations for these systems.

Additionally, as it relates to black carbon emissions, many NAFEM members make charbroilers for use in commercial cooking. Per ARB's draft, many standards are already in place help reduce emissions from these machines. As with any transition, any change to regulations would take a significant amount of time. NAFEM and its member companies are eager to work with ARB to research and study feasible alternatives that will benefit both the consumer and the environment.

We believe the consideration of the above mentioned factors will contribute to a balanced, achievable, and environmentally sound path forward. NAFEM welcomes a constructive dialogue on these issues as the Board moves forward.

Respectfully Submitted,

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